

SENT VIA EMAIL - [regionalclerk@york.ca](mailto:regionalclerk@york.ca)

File: P-2367

**May 18, 2022**

The Regional Municipality of York  
17250 Yonge Street  
Newmarket, ON L3Y 6Z1

Attention: Chris Raynor, Regional Clerk

**Re: Draft Regional Official Plan Consultation Update and Statutory Public Meeting  
Committee of the Whole, Thursday May 19, 2022  
Agenda Item F.2.1  
Block 42 Landowners Group Inc. (the "Landowners")  
City of Vaughan (the "City")  
Regional Municipality of York (the "Region")**

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KLM Planning Partners Inc. ("KLM") is the land-use planning consultant acting on behalf of the Landowners, who collectively own approximately 196.56 hectares (485.93 acres) of land located within Block 42 in the City (the "**Subject Lands**", see **Attachment 1**). The Subject Lands are bounded by Weston Road to the east, the King/Vaughan municipal boundary located north of King-Vaughan Road to the north, Pine Valley Drive to the west and Kirby Road to the south.

On December 1, 2021, the Region released a draft Regional Official Plan for public comment (the "**Draft OP**"). KLM provided comments on behalf of the Landowners on March 31, 2022 respecting the proposed employment area lands framework, and on April 18, 2022 respecting the proposed natural heritage system framework. Both letters have been appended to this letter for ease of reference. Following an extensive consultation process, an updated Draft Regional Official Plan – Track Changes Version May 2022 (the "**Updated OP**") was released on May 13, 2022. Changes proposed within the Updated OP correspond with the modifications as identified in Attachment 1 to the staff report noted above.

Both of our letters on the Draft OP have been identified/summarized by staff in Attachment 1 noted above. We note that our comments respecting the draft employment area lands framework do not appear to have resulted in any policy modifications in the Updated OP. We also note that as our comments on the proposed natural heritage system framework were submitted after the identified March 31, 2022 comment deadline, Attachment 1 identifies that the assessment of these comments is pending therefore no policy modifications are proposed to address these comments at this time.

It continues to be our position that the modifications proposed in our previous letters are appropriate and that there remains sufficient time prior to Council's anticipated adoption of the Updated OP in June, 2022 to affect change to the Updated OP in this regard.

We would appreciate the opportunity to participate in discussions related to this process and may wish to make further detailed submissions to Regional Council. Finally, as noted in our previous submissions we respectfully request notice of any future reports and/or public meetings and consultations regarding the draft Regional Official Plan, and that we receive notice of any decision of Regional Council and ultimately the Minister of Municipal Affairs and Housing.

Yours very truly,

**KLM PLANNING PARTNERS INC.**



Ryan Mino-Leahan, MCIP, RPP  
Partner



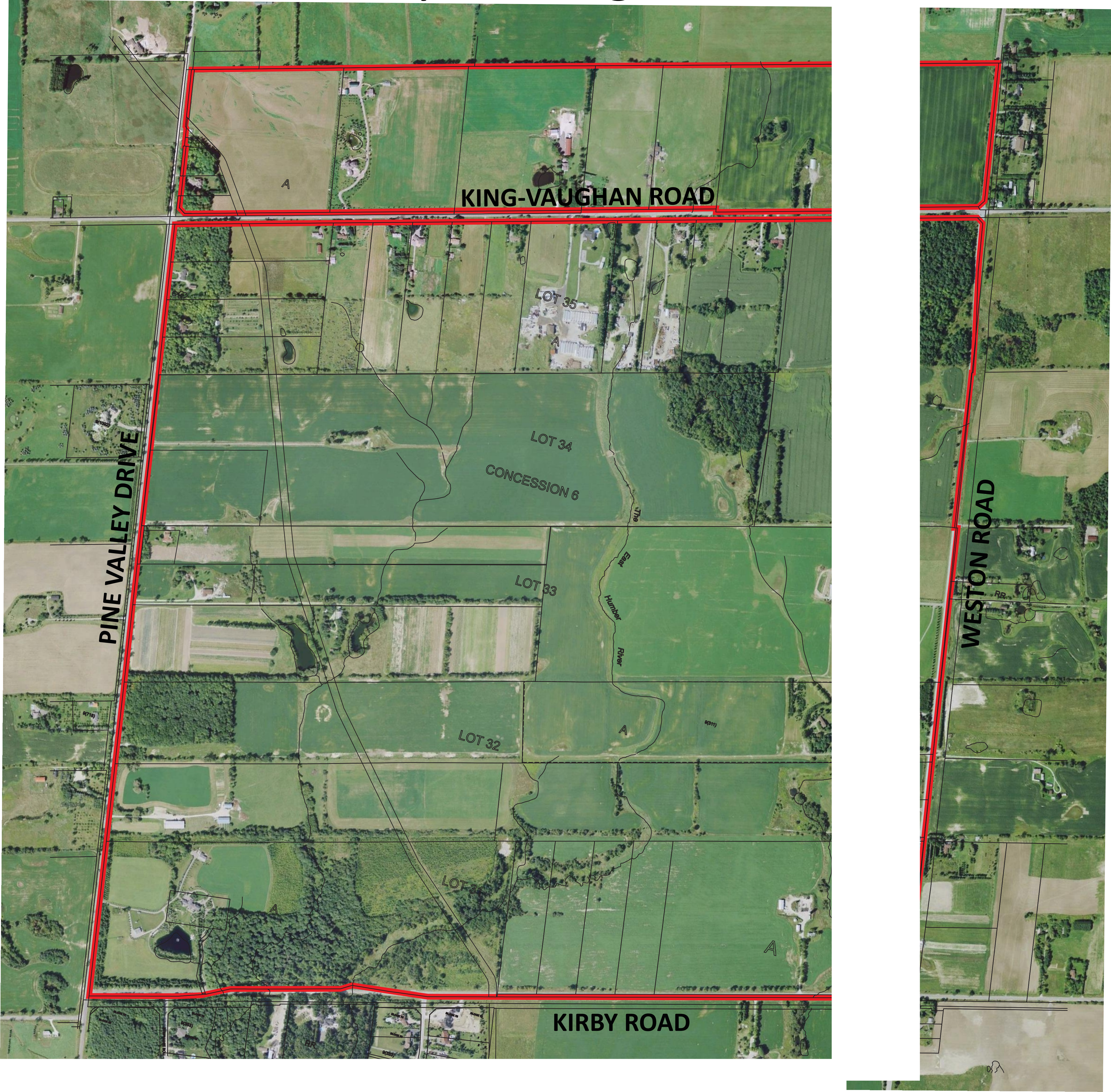
Tim Schilling, MCIP, RPP  
Senior Planner

cc: Client



# BLOCK 42 LOCATION MAP

## City of Vaughan



Legend

SUBJECT LANDS

N.T.S  
May 18, 2022



SENT VIA EMAIL - [futureyork@york.ca](mailto:futureyork@york.ca)

File: P-2367

**March 31, 2022**

The Regional Municipality of York  
17250 Yonge Street  
Newmarket, ON L3Y 6Z1

Attention: Draft Region Official Plan

**Re: Comments on the December 1, 2021 Draft York Region Official Plan  
Block 42 Landowners Group Inc. (the "Landowners")  
City of Vaughan (the "City")  
Regional Municipality of York (the "Region")**

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KLM Planning Partners Inc. is the land-use planning consultant acting on behalf of the Landowners, who collectively own approximately 238.22 hectares (588.65 acres) of land located within Block 42 in the City (the "**Subject Lands**", see **Attachment 1**). Block 42 is bounded by Weston Road to the east, the King/Vaughan municipal boundary located north of King-Vaughan Road to the north, Pine Valley Drive to the west and Kirby Road to the south.

On December 1, 2021, the Region released a draft Regional Official Plan (the "**Draft OP**") for public comment. We understand that comments are requested by March 31, 2022, with a statutory public open house and statutory public meeting scheduled for May 2022.

We have completed a review of the Draft OP on behalf of the Landowners and provide the following comments:

1. Section 4.3.12 of the Draft OP introduces a framework for the Regional Employment Area consisting of 'Core Employment Areas' and 'Supporting Employment Areas', to be mapped in local municipal Official Plans. The majority of a municipality's employment areas are required to be identified as Core Employment Areas, with Supporting Employment Areas generally to be limited to the periphery of employment areas adjacent to arterial roads.

Core Employment Areas and Supporting Employment Areas are proposed to be defined as follows:

***Core Employment Area*** - *Employment areas and/or portions of employment areas to be designated in local official plans that generally are:*

- i. *Within employment areas adjacent to, or in proximity to 400-series highways*
- ii. *Adjacent to, or in proximity to, existing or planned employment uses that are incompatible with non-employment uses. Examples include noxious uses and/or*



- traditional and/or land extensive employment uses such as manufacturing, warehousing and logistics*
- iii. *Not appropriate for more flexible employment uses*

**Supporting Employment Area** - *Employment areas and/or portions of employment areas to be designated in local official plans that are on the periphery of employment areas and/or may be candidates for mixed employment uses because of their location within existing or proposed intensification areas. This generally includes employment areas that:*

- a. are adjacent to major Regional arterial roads or on the fringe of employment areas;*
- b. have significant portions of commercial, retail, and/or other service or knowledge-based uses;*
- c. are directly abutting or in close proximity to residential or other sensitive uses and could benefit from more appropriate buffering from existing or future employment uses that may be incompatible.*

*Examples include noxious uses, clusters of manufacturing or other traditional employment uses.*

Our concern with the proposed employment area framework is that the distinction between the Core Employment Areas and Supporting Employment Areas is not clear in terms of identifying where noxious uses and traditional and land-extensive employment uses such as manufacturing, warehousing and logistics can go.

The proposed definition of Core Employment Areas identifies, amongst other locational criteria, that they are adjacent or in proximity to existing or planned employment uses that are incompatible with non-employment uses (e.g., manufacturing).

The proposed definition of Supporting Employment Areas identifies, amongst other locational criteria, that they are on the periphery of employment areas and directly abut or are in close proximity to residential or other sensitive uses which benefit from buffering from existing or future employment uses.

Both definitions appear to preclude the establishment of noxious uses and/or traditional and/or land-extensive employment uses such as manufacturing, warehousing and logistics.

**We recommend that the Region's employment area framework generally reflect that of the West Vaughan Employment Area Secondary Plan, in which employment land use designations are categorized as either "General" or "Prestige".**

The General Employment designation is intended to accommodate uses such as industrial, manufacturing and warehousing that, due to their need for outside storage and their possibility of producing noise, odour or other emissions, are not compatible with other uses and therefore cannot be accommodated within other designations.

The Prestige Employment designation is intended to accommodate light industrial, manufacturing and warehousing uses that do not produce noxious emissions and that do not require outside



storage. This designation often acts as an interface and buffer between other, more sensitive, community areas and the uses in a General Employment area.

This approach appropriately accommodates noxious, traditional and/or land-extensive employment uses such as manufacturing, warehousing and logistics.

2. We also note that we have engaged with Beacon Environmental to undertake a comprehensive review of the proposed Natural Heritage/Regional Greenlands Systems policies on behalf of the landowners. Beacon have not yet completed their review, as such we may wish to make further comments related to the above at a future date. We will provide any comments in this regard to the Region as soon as possible.

We would appreciate the opportunity to participate in discussions related to the Draft OP, and may wish to make further detailed submissions.

Finally, we respectfully request notice of any future reports and/or public meetings and consultations regarding the Draft OP, and that we receive notice of any decision of Regional Council.

Yours very truly,

**KLM PLANNING PARTNERS INC.**



Ryan Mino-Leahan, MCIP, RPP  
Partner



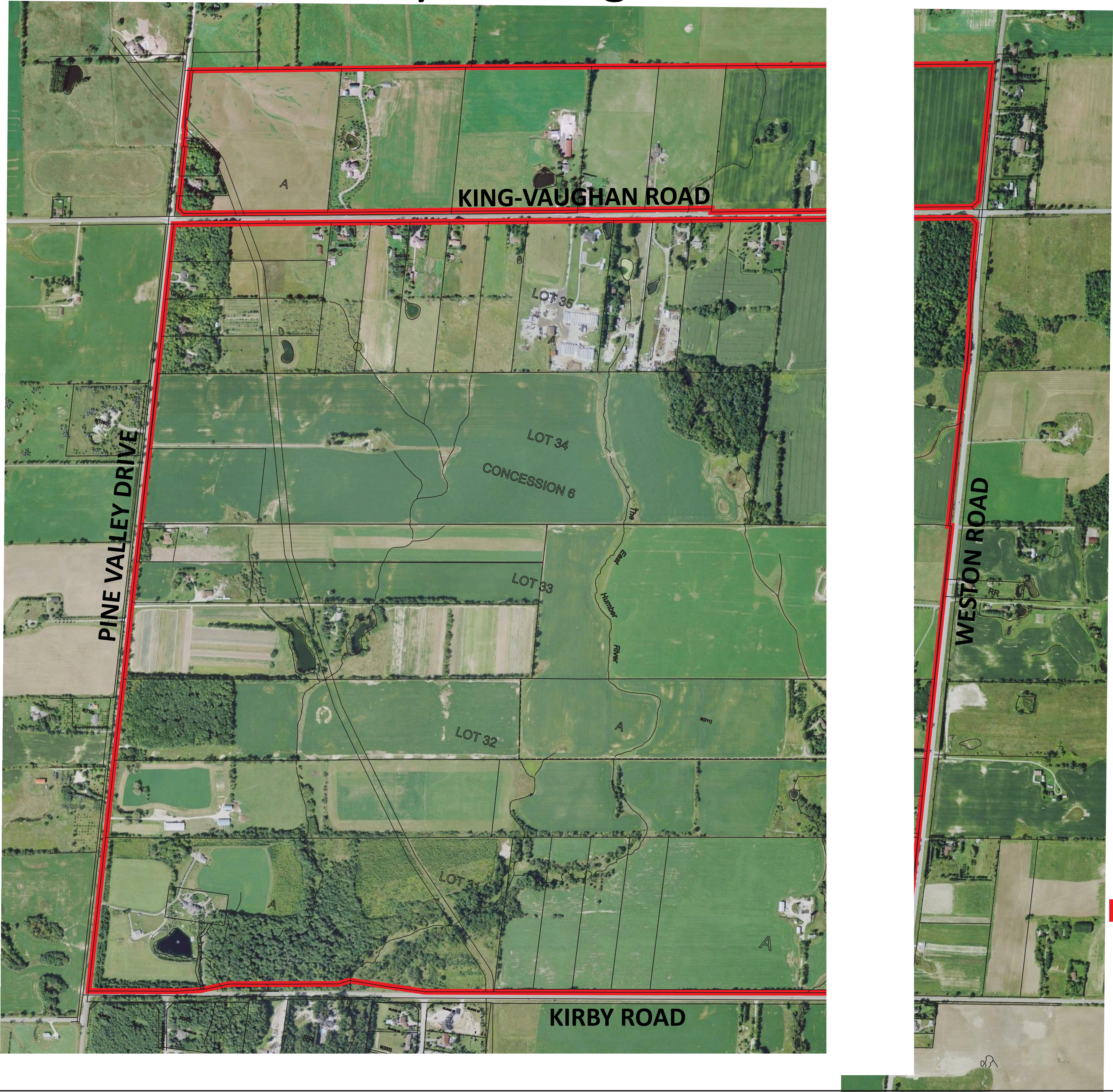
Tim Schilling, MCIP, RPP  
Senior Planner

cc: Client



# BLOCK 42 LOCATION MAP

## City of Vaughan



Legend  
 SUBJECT LANDS

N.T.S  
March 31, 2022



SENT VIA EMAIL - [futureyork@york.ca](mailto:futureyork@york.ca)

File: P-2367

**April 18, 2022**

The Regional Municipality of York  
17250 Yonge Street  
Newmarket, ON L3Y 6Z1

Attention: Chris Raynor, Regional Clerk

**Re: Comments on the December 1, 2021 Draft York Region Official Plan  
Block 42 Landowners Group Inc. (the "Landowners")  
City of Vaughan (the "City")  
Regional Municipality of York (the "Region")**

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KLM Planning Partners Inc. ("KLM") is the land-use planning consultant acting on behalf of the Landowners, who collectively own approximately 238.22 hectares (588.65 acres) of land located within Block 42 in the City (the "**Subject Lands**", see **Attachment 1**). The Subject Lands are bounded by Weston Road to the east, the King/Vaughan municipal boundary located north of King-Vaughan Road to the north, Pine Valley Drive to the west and Kirby Road to the south.

On December 1, 2021, the Region released a draft Regional Official Plan (the "**Draft OP**") for public comment. KLM provided comments on behalf of the Landowners on March 31, 2022, while noting that additional comments may be forthcoming once a review of the proposed Natural Heritage/Greenlands System policies was completed.

With the assistance of the Landowners' natural heritage consultants, Beacon Environmental, we have now completed a review of the proposed Natural Heritage/Greenlands System policies, and provide the following comments:

1. Section 3.4 Table, page 49, identifies what are considered "Key Natural Heritage Features". One of these, "Significant Wildlife Habitat", is noted to include "*habitat of special concern species*", which deviates from Provincial Policy. That policy is intended to protect significant habitat, not any habitat, which may for example be artificial and inconsequential (such as a roadside). This is an important point, as many special concern species are widespread and common.

**We recommend that the notation within the Table be revised as follows: "*including significant habitat of special concern species*".**

2. Table 3: Minimum Buffer/Vegetation Protection Zone of the Draft OP specifies minimum buffers to features for Settlement Areas within the area subject to the *Oak Ridges Moraine Conservation*



*Plan* (the “*ORMCP*”) of 30 metres, whereas s. 21.4 of the *ORMCP* allows considerable flexibility to determine appropriate buffers. The Draft OP goes much further than the *ORMCP*.

**We recommend that the Draft OP be revised to conform with the *ORMCP* per the above.**

3. Also within Table 3, for “Other Evaluated Wetlands” (*i.e.* non- Provincially Significant Wetlands) that are retained, a minimum buffer of 15 metres is required, whereas the Toronto Region Conservation Authority requires a minimum buffer of 10 metres.

**We recommend that the Draft OP be revised to identify that for “Other Evaluated Wetlands”, minimum buffers will be “As determined by an Environmental Impact Study”, rather than a pre-established minimum.**

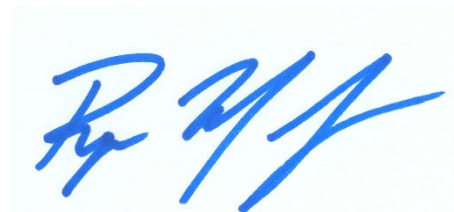
4. Policy 3.4.2.6 (a. ii.) is unclear with respect to whether the exception cited for Butternut trees extends to other species for which an *Endangered Species Act* permit may be issued. The specificity of this exception is likely to be an issue for small, wooded patches with bats, where a permit (or future exemption) could be granted, but the 0.5 hectare woodlot would still be deemed to be significant.

**We recommend that policy 3.4.2.6 a. ii. be revised by removing the reference to Butternut trees, and replacing with a general phrase such as, “except where permitted by a process under the *Endangered Species Act*.”**

We would appreciate the opportunity to participate in discussions related to the Draft OP, and may wish to make further detailed submissions.

Finally, as noted in our previous submission, we respectfully request notice of any future reports and/or public meetings and consultations regarding the Draft OP, and that we receive notice of any decision of Regional Council.

Yours very truly,  
KLM PLANNING PARTNERS INC.



Ryan Mino-Leahan, MCIP, RPP  
Partner



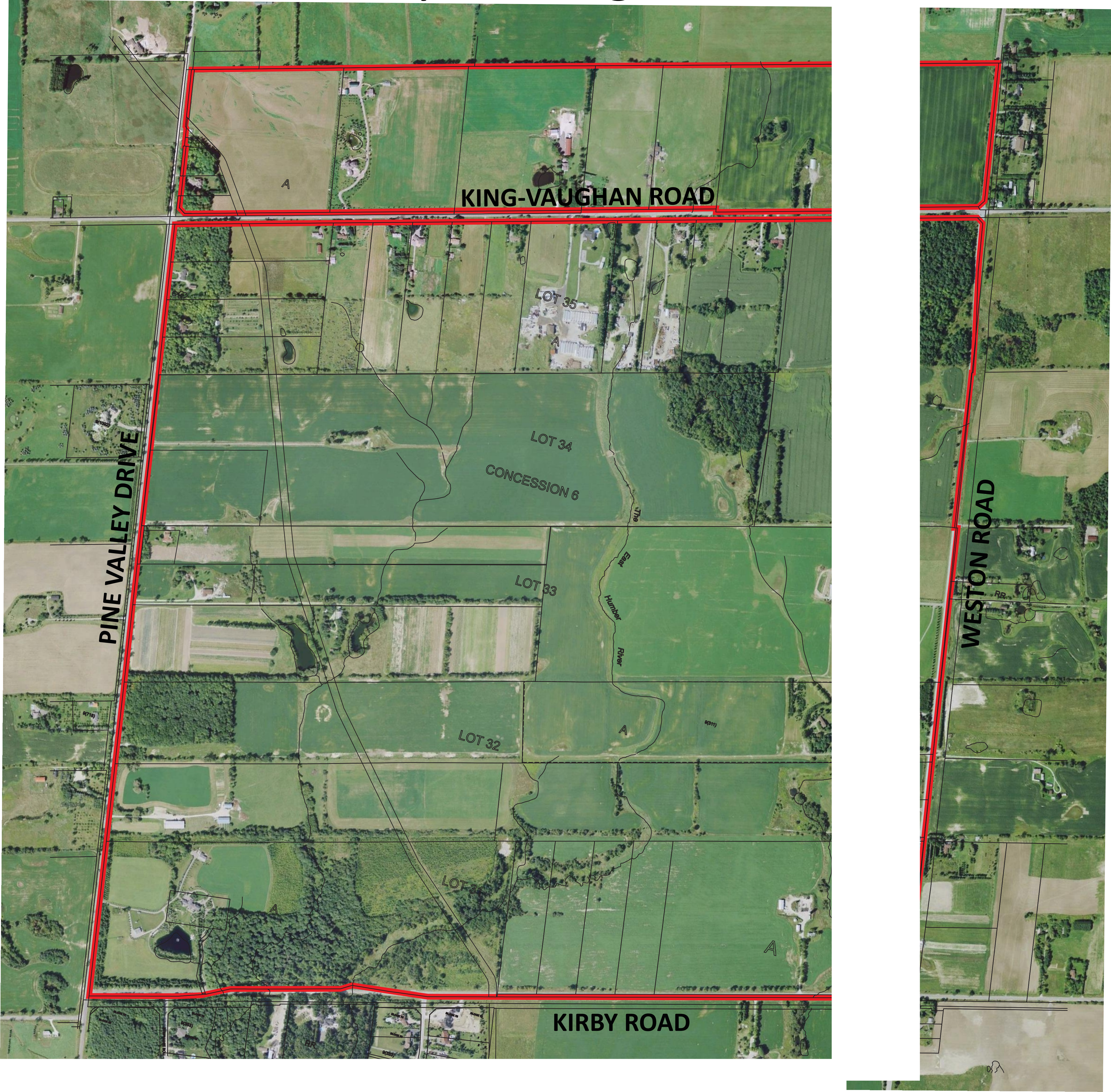
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Beacon Environmental



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April 18, 2022